

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Ashley Sronkoski,

Plaintiff,

v.

Healthcare Revenue Recovery Group, LLC
dba Account Resolution Services
c/o Illinois Corporation Service Corp.
801 Adlai Stevenson Drive
Springfield, IL 62703

Defendant.

Case No.

COMPLAINT

Jury Demand Requested

JURISDICTION AND VENUE

- 1- This court has jurisdiction pursuant to 28 U.S.C. §1331 and 15 U.S.C. §1692k(d).
- 2- Venue is proper because a substantial part of the events giving rise to this claim occurred in this District.

PARTIES

- 3- Plaintiff is a resident of the State of Illinois.
- 4- Plaintiffs incurred an obligation to pay money, the primary purpose of which was for personal, family, or household uses (the "Debt").
- 5- Defendant is a corporation with its principal place of business in the State of Florida.
- 6- Defendant uses instruments of interstate commerce for its principal purpose of business, which is the collection of debts.
- 7- Defendant regularly attempts to collect, or attempts to collect, debts owed or due another.
- 8- At all times relevant, Defendant owned the Debt or was retained to collect the Debt.

FACTS COMMON TO ALL COUNTS

- 9- On or around December 4, 2014, Plaintiff filed a voluntary bankruptcy petition that included the Debt.
- 10- Despite the bankruptcy filing, on or around December 29, 2014, Defendant sent a letter to Plaintiff to collect the Debt.
- 11- At the time of this communication, Defendant knew, or should have known, about Plaintiff's bankruptcy filing.
- 12- Upon information and belief, Defendant failed to maintain reasonable procedures to avoid violations of the FDCPA by collecting on bankrupt debt.
- 13- Defendant damaged Plaintiff.
- 14- Defendant violated the FDCPA.

COUNT I

- 15- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.
- 16- Defendant violated 15 USC § 1692e(8) by sending false credit information to the credit reporting bureaus.

COUNT II

- 17- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.
- 18- Defendant violated 15 USC § 1692e(2) by falsely representing the legal status of the debt.

COUNT III

- 19- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.
- 20- Defendant violated 15 USC § 1692f by engaging in unfair and unconscionable practices to collect a debt.

JURY DEMAND

- 21- Plaintiff demands a trial by jury.

PRAYER FOR RELIEF

22- Plaintiff prays for the following relief:

- a. Judgment against Defendant for Plaintiff's actual damages, as determined at trial, suffered as a direct and proximate result Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(1);
- b. Judgment against Defendant for \$1,000 in statutory damages for Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(2)(A);
- c. Judgment against Defendant for Plaintiff's reasonable attorney's fees and costs incurred in this action, pursuant to 15 U.S.C. §1692k(a)(3); and
- d. Any other legal and/or equitable relief as the Court deems appropriate.

RESPECTFULLY SUBMITTED,

Meier LLC

By: /s/ Richard J. Meier

Richard J. Meier, Esq.

53 W. Jackson Blvd, Suite 304

Chicago, IL 60604

Tel: 312-242-1849

Fax: 312-242-1841

Richard@meierllc.com

Attorney for Plaintiff